

Message

From: Lopez, Catherine [catherine.lopez@doh.hawaii.gov]
Sent: 10/25/2018 1:09:41 AM
To: Salazar, Matt [Salazar.Matt@epa.gov]
CC: Yannayon, Laura [Yannayon.Laura@epa.gov]; Rios, Gerardo [Rios.Gerardo@epa.gov]; Dancher, Nathan [Dancher.Nathan@epa.gov]
Subject: RE: new technology - pyrolysis unit processing plastics
Attachments: Working flow-Pyrolysis machine.png

Thank you Matt!

Nathan,

I don't have very much information on the unit, but can work with the potential owner to obtain additional information.

1. Attached is a process flow diagram of the system.
2. The pilot project would have the capacity to process a single load of either 1 or 5 tons of plastic per day.
3. The heating chamber heats to approximately 400 - 500 degrees Celsius. I have nothing in writing to confirm these temperatures.
4. Initially the system would burn synthetic natural gas or propane.

Please feel free to call or email with additional questions or comments.

Thank you,

Cathy

From: Salazar, Matt [mailto:Salazar.Matt@epa.gov]
Sent: Wednesday, October 24, 2018 2:25 PM
To: Lopez, Catherine <catherine.lopez@doh.hawaii.gov>
Cc: Yannayon, Laura <Yannayon.Laura@epa.gov>; Rios, Gerardo <Rios.Gerardo@epa.gov>; Dancher, Nathan <Dancher.Nathan@epa.gov>
Subject: Re: new technology - pyrolysis unit processing plastics

Hi Cathy,

Thank you for checking. Nathan Dancher is planning to call to learn more. Please let me know if you have any questions.

Thank you,

Matt

Sent from my iPhone

On Oct 23, 2018, at 2:06 PM, Lopez, Catherine <catherine.lopez@doh.hawaii.gov> wrote:

Thank you Laura!

From: Yannayon, Laura [mailto:Yannayon.Laura@epa.gov]
Sent: Tuesday, October 23, 2018 11:02 AM
To: Lopez, Catherine <catherine.lopez@doh.hawaii.gov>
Cc: Salazar, Matt <Salazar.Matt@epa.gov>
Subject: RE: new technology - pyrolysis unit processing plastics

Hi Cathy,

Interesting question. I think it best to reach out to our enforcement division to obtain an applicability determination. You should also inquire if this would be considered a "fuel conversion process" subject to

the list of 28 source categories under PSD, since they have a 100 tpy applicability threshold. More of a long term issue if they decide to build a full size plant.

I've cc'd Matt Salazar on this email response, so hopefully he can assign someone on his staff to follow up with you. If you don't hear anything back from Matt, or his staff, then please give him a call at 415-972-3982.

Laura

From: Lopez, Catherine [<mailto:catherine.lopez@doh.hawaii.gov>]

Sent: Tuesday, October 23, 2018 1:51 PM

To: Yannayon, Laura <Yannayon.Laura@epa.gov>

Subject: new technology - pyrolysis unit processing plastics

Hi Laura,

Someone in Hawaii is exploring the possibility constructing a pilot project to process plastics (not including PVC) using pyrolysis to produce crude oil. The system heats the outside of the processing chamber using natural gas. The end products are a synthesis gas, which is flared, and the crude oil.

I didn't find any reference to pyrolysis in 40 CFR Part 60 Subpart CCCC for Commercial and Industrial Solid Waste Incineration units. Since no reference to pyrolysis is made in CCCC, is it safe to say that the unit is not considered an incineration unit and not subject to CCCC? Should I direct my question to the EPA's Enforcement office?

Sorry to bother you with this question.

Thank you,
Cathy
808-586-4200